

1 Steven J. Parsons
Nevada Bar No. 363
2 LAW OFFICES OF STEVEN J. PARSONS
10091 Park Run Dr Ste 200
3 Las Vegas, NV 89145-8868
(702) 384-9900
4 (702) 384-5900 – (fax)
Steve@SJPlawyer.com

5 Attorney for Plaintiff
6 NEVADA TITLE COMPANY

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 NEVADA TITLE COMPANY, a Nevada
corporation,

10 Plaintiff,

11 vs.

12 ACE AMERICAN INSURANCE COMPANY, a
13 Pennsylvania corporation,

14 Defendant.

15 _____/
and counterclaim.
16 _____/

Case No. 2:18-cv-1823-GMN-(VCF)

THE PARTIES' STIPULATION and
(PROPOSED) ORDER TO ENLARGE TIME
FOR PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION TO MODIFY
SCHEDULING ORDER TO PHASE
DISCOVERY AND SCHEDULE DISPOSITIVE
MOTIONS ON CLAIMS RELATING TO NTC'S
PRIOR KNOWLEDGE (Doc. 37)
(First Request)

17 Plaintiff and Counter-defendant, NEVADA TITLE COMPANY, ("NTC") by its counsel,
18 Steven J. Parsons, of LAW OFFICES OF STEVEN J. PARSONS, and Defendant and Counter-claimant,
19 ACE AMERICAN INSURANCE COMPANY, ("ACE American") by its counsel, Michael W.
20 Melendez, of COZEN O'CONNOR, hereby stipulate and agree that NTC shall have to and including
21 Monday, May 13, 2019 to respond to ACE American's Motion to Modify Scheduling Order
22 (Doc. 37).

23 This Stipulation between the parties to allow NTC additional time to respond to the
24 Motion to Modify Scheduling Order is the first request; Plaintiff asserts it is necessitated by

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current and ongoing health conditions of Plaintiff's counsel Steven J. Parsons;¹ and is not simply for the purposes of delay.

Dated: Monday, April 29, 2019.

LAW OFFICES OF STEVEN J. PARSONS

COZEN O'CONNOR

/s/ Steven J. Parsons
STEVEN J. PARSONS
Nevada Bar No. 363

/s/ Michael W. Melendez
MICHAEL W. MELENDEZ
Nevada Bar No. 6741

Attorney for Plaintiff and Counter-defendant
NEVADA TITLE COMPANY

Attorney for Defendant and Counter-claimant
ACE AMERICAN INSURANCE COMPANY

ORDER

IT IS SO ORDERED.

Dated: 4-30-2019



U.S. MAGISTRATE JUDGE

¹As good cause shown, Mr. Parsons submits that he has endured a series of foot injuries, and as a diabetic, he has a history of such injuries becoming infected and posing further risks to his health. These injuries and the treatment of the injuries has caused his absence from timely Responding to Defendant's Motion and Defendant's discovery requests.

On Friday, March 22, 2019, upon presenting with a recurring injury already the subject of care, treatment, and absence from the office, the wound care physician attending to Mr. Parsons immediately sent him to the hospital. Mr. Parsons was discharged late Monday, March 25, 2019. However, Mr. Parsons then learned from his orthopedist that he must submit to surgery, which took place on Thursday, April 4, 2019 to deal with the suspected MRSA-infection and restructuring of the wound. In total, Mr. Parsons has been on medication and doctors' orders to stay off of his feet and not undertake office work since the first recurrence of his injuries over seven (7) weeks ago. In that time, Mr. Parsons has been in the office only sporadically for less than two (2) days.

Mr. Parsons is to receive another assessment of his recovery on Friday, May 10, 2019. At that time, he may be released from home care and allowed to resume walking.

Notwithstanding Defendant's Motion (Doc. No. 37), the parties have agreed to seek the Court's modification and extension of the Discovery Plan and Scheduling Order to extend all deadlines ninety (90) days. The parties will execute and file that stipulation by Friday, May 3, 2019.